UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

SOVEREIGN BANK, SUCCESSOR BY MERGER WITH FIRST ESSEX BANK, F.S.B.,

Plaintiff,

V.

BOWDITCH BOAT HOLDING, LLC; GOLDENEYE CORPORATION; SALEM WHALE WATCH & CRUISE COMPANY, LLC; LAKE CHAMPLAIN TRANSPORTATION COMPANY; ROBERT E. BLAIR, JR.; ROBERT J. SALEM AND HENRY LORD,

Defendants.

Civil Action No. 05-10668-NMG

PLAINTIFF'S CORPORATE DISCLOSURE STATEMENT

Sovereign Bank, pursuant to Fed.R.Civ.P. 7.1 and Local Rule 7.3, states that Sovereign Bank is a wholly owned subsidiary of Sovereign Bancorp, Inc., a Pennsylvania corporation. Sovereign Bancorp, Inc. is a publicly traded company, and no one person or entity owns 20% or more of the stock.

Dated: May 4, 2005

Sovereign Bank, successor by merger with First Essex Bank, F.S.B.

By its Attorney,

RIEMER & BRAUNSTEIN LLP

/s/ Meegan B. Casey
Meegan B. Casey
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CERTIFICATE OF SERVICE

I, Meegan B. Casey, hereby certify that a true copy of the above document was served upon the attorney of record for each party as indicated below by mail on this date, May 4, 2005.

Brian Flanagan, Esquire Flanagan & Hunter, P.C. 88 Black Falcon Avenue, Suite 274 Boston, Massachusetts 02210 Stephen M. Ouellette, Esquire Cianciulli and Oellette 163 Cabot Street Beverly, Massachusetts 01915

/s/ Meegan B. Casey Meegan B. Casey

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